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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

LEHMAN BROTHERS INC.,

Case No. 08-01420 (SCC) SIPA

Debtor.

CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746 REGARDING TRUSTEE'S ONE HUNDRED SEVENTY-EIGHTH OMNIBUS OBJECTION TO GENERAL CREDITOR CLAIMS (NO LIABILITY CLAIMS)

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's amended case management procedures set forth in the Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures, entered on July 13, 2010 (ECF No. 3466) (the "Amended Case Management Order"), and the Order pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 3007 and 9019(b) for Approval of General Creditor Claim Objection Procedures, entered on November 15, 2012 (ECF No. 5441) (the "Claims Objection Procedures Order"), the undersigned hereby certifies as follows:

- 1. On December 20, 2013, the undersigned, on behalf of James W. Giddens (the "<u>Trustee</u>"), as Trustee for the SIPA liquidation of Lehman Brothers Inc., caused the Trustee's One Hundred Seventy-Eighth Omnibus Objection to General Creditor Claims (No Liability Claims) (ECF No. 7953) (the "<u>Objection</u>") to be filed with the United States Bankruptcy Court for the Southern District of New York.
- 2. In furtherance of the Claims Objection Procedures Order, January 10, 2014 at 4:00 p.m. (Prevailing Eastern Time) was established as the deadline for parties to object or file a response to the Objection (the "Response Deadline"). The Amended Case Management Order

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provides that pleadings may be granted without a hearing, provided that no objections have been

filed prior to the relevant Response Deadline and the attorney for the entity who filed the

pleading complies with the relevant procedural and notice requirements.

3. The Response Deadline has now passed and, to the best of my knowledge, no

objection or other responsive pleading to the Objection has been filed with the Court on the

docket of the above-referenced case in accordance with the procedures set forth in the Amended

Case Management Order, nor has any objection or other responsive pleading with respect to the

Objection been served on counsel to the Trustee to date.

4. Accordingly, for the reasons set forth in the Objection, the Trustee respectfully

requests that the proposed Order annexed hereto as Exhibit A be entered in accordance with the

procedures described in the Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: New York, New York

February 14, 2014

HUGHES HUBBARD & REED LLP

By:/s/ Jeffrey S. Margolin

James B. Kobak, Jr.

Christopher K. Kiplok

Jeffrey S. Margolin

Meaghan C. Gragg

One Battery Park Plaza

New York, New York 10004

Telephone: (212) 837-6000

Facsimile: (212) 422-4726

Email: kobak@hugheshubbard.com

Attorneys for James W. Giddens, Trustee for

the SIPA Liquidation of Lehman Brothers

Inc.

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EXHIBIT A

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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LEHMAN BROTHERS INC.,

Case No. 08-01420 (SCC) SIPA

Debtor.

[PROPOSED] ORDER GRANTING THE TRUSTEE'S ONE HUNDRED SEVENTY-EIGHTH OMNIBUS OBJECTION TO GENERAL CREDITOR CLAIMS (NO LIABILITY CLAIMS)

Upon the One Hundred Seventy-Eighth omnibus objection to claims, dated

December 20, 2013 (the "One Hundred Seventy-Eighth Omnibus Objection to General Creditor

Claims"), of James W. Giddens (the "Trustee"), as trustee for the liquidation of Lehman

Brothers Inc. (the "Debtor" or "LBI") under the Securities Investor Protection Act of 1970, as amended, 15 U.S.C. §§ 78aaa et seq. ("SIPA"), seeking entry of an order, pursuant to section

502(b) of title 11 of the United States Code (the "Bankruptcy Code"), as made applicable to this proceeding pursuant to sections 78fff(b) and 78fff-1(a) of SIPA, and Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), disallowing and expunging the No

Liability Claims on the grounds that LBI does not have any liability, in whole or in part, all as more fully described in the One Hundred Seventy-Eighth Omnibus Objection to General

Creditor Claims; and due and proper notice of the One Hundred Seventy-Eighth Omnibus

Objection to General Creditor Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the One Hundred Seventy-Eighth Omnibus Objection to General Creditor Claims is in

^{1.} Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the objection.

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the best interests of LBI, its estate, its customers and creditors, and all parties in interest and that

the legal and factual bases set forth in the One Hundred Seventy-Eighth Omnibus Objection to

General Creditor Claims establish just cause for the relief granted herein; and after due

deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the One Hundred Seventy-Eighth

Omnibus Objection to General Creditor Claims is granted; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims

listed on Exhibit 1 (collectively, the "No Liability Claims") are disallowed and expunged in their

entirety with prejudice; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all

matters arising from or related to the implementation and/or interpretation of this Order.

Dated: New York, New York

February _____, 2014

HONORABLE SHELLEY C. CHAPMAN, UNITED STATES BANKRUPTCY JUDGE

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EXHIBIT 1

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IN RE LEHMAN BROTHERS INC., CASE NO: 08-01420 (SCC) SIPA ONE HUNDRED SEVENTY-EIGHTH OMNIBUS OBJECTION: EXHIBIT 1 – NO LIABILITY CLAIMS

	NAME / ADDRESS OF CLAIMANT	CLAIM NUMBER	DATE FILED	TOTAL CLAIM DOLLARS	TRUSTEE'S REASON FOR PROPOSED DISALLOWANCE
1	HOON, SEE PECK 18 WOOLLERTON PARK SINGAPORE 257524 SINGAPORE	4920	5/29/2009	\$100,000.00	NO LEGAL OR FACTUAL JUSTIFICATION FOR ASSERTING A CLAIM AGAINST LBI. THE CLAIMED SECURITIES WERE NOT ISSUED OR GUARANTEED BY LBI. MOREOVER, THE CLAIMANT FAILS TO ASSERT A PLAUSIBLE CLAIM OF FRAUD OR MISREPRESENTATION AGAINST LBI.
2	LENG, LAM YEEN BLOCK 232 #13-31 WESTWOOD AVENUE SINGAPORE 648360 SINGAPORE	4796	5/27/2009	\$378,054.00	NO LEGAL OR FACTUAL JUSTIFICATION FOR ASSERTING A CLAIM AGAINST LBI. THE CLAIMED SECURITIES WERE NOT ISSUED OR GUARANTEED BY LBI. MOREOVER, THE CLAIMANT FAILS TO ASSERT A PLAUSIBLE CLAIM OF FRAUD OR MISREPRESENTATION AGAINST LBI.
3	LOCK, LO @ LO LOKE YEE BLOCK 110 # 05-96 ALJUNIED - CRESCNET SINGAPORE 380110 SINGAPORE	5994	6/5/2009	\$42,006.00	NO LEGAL OR FACTUAL JUSTIFICATION FOR ASSERTING A CLAIM AGAINST LBI. THE CLAIMED SECURITIES WERE NOT ISSUED OR GUARANTEED BY LBI. MOREOVER, THE CLAIMANT FAILS TO ASSERT A PLAUSIBLE CLAIM OF FRAUD OR MISREPRESENTATION AGAINST LBI.
4	MIN, LIM HAK BLOCK 212 BISHAN STREET 23 08-253 SINGAPORE 570212 SINGAPORE	7002040	5/25/2009	\$11,000.00	NO LEGAL OR FACTUAL JUSTIFICATION FOR ASSERTING A CLAIM AGAINST LBI. THE CLAIMED SECURITIES WERE NOT ISSUED OR GUARANTEED BY LBI. MOREOVER, THE CLAIMANT FAILS TO ASSERT A PLAUSIBLE CLAIM OF FRAUD OR MISREPRESENTATION AGAINST LBI.
5	UNITED OVERSEAS BANK NOMINEES (PRIVATE) LTD ON BEHALF OF ITS CLIENTS ATTN: ONG POH LEE 156 CECIL STREET #08-03 SINGAPORE 069544 SINGAPORE	7002190	5/29/2009	\$7,695,000.00	NO LEGAL OR FACTUAL JUSTIFICATION FOR ASSERTING A CLAIM AGAINST LBI. THE CLAIMED SECURITIES WERE NOT ISSUED OR GUARANTEED BY LBI. MOREOVER, THE CLAIMANT FAILS TO ASSERT A PLAUSIBLE CLAIM OF FRAUD OR MISREPRESENTATION AGAINST LBI.

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	NAME / ADDRESS OF CLAIMANT	CLAIM NUMBER	DATE FILED	TOTAL CLAIM DOLLARS	TRUSTEE'S REASON FOR PROPOSED DISALLOWANCE
6	UNITED OVERSEAS BANK NOMINEES (PRIVATE) LTD ON BEHALF OF ITS CLIENTS ATTN ONG POH LEE UNITED OVERSEAS BANK NOMINEES PTE LTD 156 CECIL STREET #08-03 SINGAPORE 069544 SINGAPORE	7002192	5/29/2009	\$2,274,000.00	NO LEGAL OR FACTUAL JUSTIFICATION FOR ASSERTING A CLAIM AGAINST LBI. THE CLAIMED SECURITIES WERE NOT ISSUED OR GUARANTEED BY LBI. MOREOVER, THE CLAIMANT FAILS TO ASSERT A PLAUSIBLE CLAIM OF FRAUD OR MISREPRESENTATION AGAINST LBI.
7	UNITED OVERSEAS BANK NOMINEES (PRIVATE) LTD ON BEHALF OF ITS CLIENTS ATTN ONG POH LEE UNITED OVERSEAS BANK NOMINEES PTE LTD 156 CECIL STREET #08-03 SINGAPORE 069544 SINGAPORE	7002193	5/29/2009	\$4,005,000.00	NO LEGAL OR FACTUAL JUSTIFICATION FOR ASSERTING A CLAIM AGAINST LBI. THE CLAIMED SECURITIES WERE NOT ISSUED OR GUARANTEED BY LBI. MOREOVER, THE CLAIMANT FAILS TO ASSERT A PLAUSIBLE CLAIM OF FRAUD OR MISREPRESENTATION AGAINST LBI.
8	UNITED OVERSEAS BANK NOMINEES (PRIVATE) LTD ON BEHALF OF ITS CLIENTS ATTN ONG POH LEE UNITED OVERSEAS BANK NOMINEES PTE LTD 156 CECIL STREET #08-03 SINGAPORE 069544 SINGAPORE	7002194	5/29/2009	\$200,000.00	NO LEGAL OR FACTUAL JUSTIFICATION FOR ASSERTING A CLAIM AGAINST LBI. THE CLAIMED SECURITIES WERE NOT ISSUED OR GUARANTEED BY LBI. MOREOVER, THE CLAIMANT FAILS TO ASSERT A PLAUSIBLE CLAIM OF FRAUD OR MISREPRESENTATION AGAINST LBI.
9	UNITED OVERSEAS BANK NOMINEES (PRIVATE) LTD ON BEHALF OF ITS CLIENTS ATTN ONG POH LEE UNITED OVERSEAS BANK NOMINEES PTE LTD 156 CECIL STREET #08-03 SINGAPORE 069544 SINGAPORE	7002199	5/29/2009	\$548,000.00	NO LEGAL OR FACTUAL JUSTIFICATION FOR ASSERTING A CLAIM AGAINST LBI. THE CLAIMED SECURITIES WERE NOT ISSUED OR GUARANTEED BY LBI. MOREOVER, THE CLAIMANT FAILS TO ASSERT A PLAUSIBLE CLAIM OF FRAUD OR MISREPRESENTATION AGAINST LBI.
10	UNITED OVERSEAS BANK NOMINEES (PRIVATE) LTD ON BEHALF OF ITS CLIENTS ATTN ONG POH LEE UNITED OVERSEAS BANK NOMINEES PTE LTD 156 CECIL STREET #08-03 SINGAPORE 069544 SINGAPORE	7002204	5/29/2009	\$9,761,000.00	NO LEGAL OR FACTUAL JUSTIFICATION FOR ASSERTING A CLAIM AGAINST LBI. THE CLAIMED SECURITIES WERE NOT ISSUED OR GUARANTEED BY LBI. MOREOVER, THE CLAIMANT FAILS TO ASSERT A PLAUSIBLE CLAIM OF FRAUD OR MISREPRESENTATION AGAINST LBI.

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11	UNITED OVERSEAS BANK NOMINEES (PRIVATE)	7002191	5/29/2009	\$4,958,904.00	NO LEGAL OR FACTUAL JUSTIFICATION
	LTD ON BEHALF OF ITS CLIENTS				FOR ASSERTING A CLAIM AGAINST LBI.
	ATTN ONG POH LEE				THE CLAIMED SECURITIES WERE NOT
	156 CECIL STREET #08-03				ISSUED OR GUARANTEED BY LBI.
	SINGAPORE 069544				MOREOVER, THE CLAIMANT FAILS TO
	SINGAPORE				ASSERT A PLAUSIBLE CLAIM OF FRAUD OR
					MISREPRESENTATION AGAINST LBI.
	Total			\$29,972,964.00	